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January 12, 1999

TO:

File

THRU:

Joe Helfrich, Permit Supervisor

THRU:

Daron Haddock, Permit Supervisor

FROM:

Robert Davidson, Soils Reclamation Specialist PAO

RE:

Administrative Completeness Review - Lila Canyon Mine, UtahAmerican Energy,

Inc., Horse Canyon Mine, ACT/007/013-98-2, Folder #2, Carbon County, Utah

## **SYNOPSIS**

Utah America Energy, Inc., has submitted a Permit Application Package for the Lila Canyon Mine as an amendment for Horse Canyon Mine. This document supplies the Administrative Completeness Review for soils, Section R645-301-200.

## **TECHNICAL ANALYSIS**

Directions: The categories listed below correspond to the minimum requirements for information necessary to initiate processing and public review. If a category is checked the Applicant has met the Completeness requirement for that category. If a category is not checked, the Completeness requirements have not been met. The comments column will identify the deficiency and what is necessary to correct it.

		Comments
301-200	Soils	→ None of the maps show a disturbed area boundary and therefore, the Division is unable to ascertain if soil resource information is complete.  → Information in the plan is vague at best, confusing, contradictory, and inconclusive. Therefore, the Division is unable to ascertain if soil resource protection measures are adequate or meet regulatory compliance.
211	Description of Premining Soil Resources	→ Need disturbed area boundary shown on all maps to ascertain if soil resource information is complete.
212	Soil Resource Protection measures	→ Need pre-disturbance contour lines on soil salvage map.  → Need a soil salvage map.  → Need disturbed area boundary shown on soil salvage map to help determine if soil is being salvaged from disturbance affected areas.  → Information in the plan is vague at best, confusing, contradictory, and inconclusive. Therefore, the Division is unable to ascertain if soil resource protection measures are adequate or meet regulatory compliance.

221	Prime Farmland Investigation	
222, 223	Soil Survey and Soil Characterization	<b>→</b>
224	Substitute Topsoil Info (When Proposed)	→Adequate soil salvage for reclaiming the entire mine site needs to be ascertained before a determination can be made that substitute topsoil is not needed. One specific area of concern is the rock outcrop/Badland slopes. If these areas contain no soil and cannot be revegetated, then reclamation can not be achieved. Appropriate quantities of topsoil and substitute soils and rock need to be salvaged and stockpiled for reclamation of these difficult areas.
230	Operation Plan: Topsoil Handling/Removal/Storage	→ The exact location, size, dimension, etc of the topsoil stockpile is needed based on projected soil salvage volumes. Final configuation should be sized and shaped to show that enough room is available for projected soil salvage.
240	Reclamation Plan: Soil Redistribution/Stabilization	→ Need a soil redistribution and placement map.  → Projected soil replacement depths should be outlined for each reclaimed area. One specific area of concern is the rock outcrop/Badland slopes. If these areas contain no soil and cannot be revegetated, then reclamation can not be achieved. Reclamation of these difficult areas will need be addressed in depth to assure that reclamation can be achieved.

Page 4 ACT/007/013 January 12, 1999

302-321 Alluvial Valley Floor Determination → This finding needs to be made by the NRCS or BL
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## RECOMMENDATIONS

Information in the plan is vague at best, confusing, contradictory, and inconclusive. Therefore, the Division is unable to ascertain if soil resource protection measures are adequate or meet regulatory compliance. Until the plan is administratively complete, no technical analysis review can be achieved to ascertain if the plan is complete and accurate.

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